



FINDING OF NO SIGNIFICANT IMPACT
Visitor Use Site Management Plan
Lake Roosevelt National Recreation Area

September 1, 2020

BACKGROUND

The National Park Service (NPS) has completed a visitor use management planning effort for nine priority sites at Lake Roosevelt National Recreation Area (LARO/the national recreation area) and has prepared an environmental assessment (EA) to analyze potential impacts. The LARO Visitor Use Site Management Plan and Environmental Assessment (VUSMP/EA) is in compliance with the National Environmental Policy Act of 1969 (NEPA), as amended.

This finding of no significant impact and its associated EA constitutes the record of the environmental impact analysis and decision-making process. The NPS would implement the Selected Alternative (proposed action), which proposes a range of management strategies and supporting improvements to address a broader spectrum of visitors' needs and interests, including diversified camping facilities and enhancements to day use and boat launch areas as well as parking areas, roads, entrances, trails, docks, fish cleaning stations, and other visitor facilities. Implementation of management strategies and improvements would enhance visitor experience and visitor safety and would reduce impacts to the national recreation area's natural and cultural resources.

The proposed action was selected after careful analysis of resources and visitor impacts, consultation with Confederated Tribes of the Colville Reservation, Spokane Tribe of Indians, U.S. Fish and Wildlife Service, U.S. Bureau of Reclamation, the Washington State Historic Preservation Office, and other federal and state agencies, and after a review of public comments.

This document records (1) a finding of no significant impact as required by the National Environmental Policy Act of 1969; (2) a finding of no effect to federally listed species or their habitat as required by the Endangered Species Act, Section 7; and (3) a finding of no effect as required by the National Historic Preservation Act, Section 106; all described by the Director's Order #12 and Handbook (NPS 2015). This finding of no significant impact is available on the National Park Service Planning, Environmental and Public Comment (PEPC) website at:

<https://parkplanning.nps.gov/projectHome.cfm?projectID=83398>

THE PURPOSE AND NEED FOR FEDERAL ACTION

Purpose

The purpose of the LARO VUSMP is to identify management strategies to help address visitor use patterns and a greater diversity of visitor needs and interests. The nine sites within the national recreation area are increasingly popular for camping, boating, day use and other activities. The LARO VUSMP helps to define appropriate facility functions (i.e., campgrounds, boat launches, and day use areas); recommend infrastructure redesigns considering visitor use management including visitor use patterns, connections between sites, use types, site resources, and facilities; establish a consistent, unified character for development; and guide decisions on capital improvements, preservation, and development.

Need for Action

Development of a VUSMP was identified as a high priority in the foundation document (2015) to address how visitation can be increased while at the same time sustaining natural and cultural resources of the national recreation area. In August 2017, staff from LARO, the region, and the Denver Service Center (DSC) engaged in a workshop and an important outcome of the workshop was the identification of a VUSMP for the national recreation area.

Management strategies and supporting improvements are needed at these nine heavily used sites to address a wider range of visitor interests and needs related to camping, boating, day use, and other activities. Because recreation uses are changing and visitors are using a variety of camping vehicles, many of them larger than in past decades, there is a need to improve and update campgrounds. The NPS is considering diversifying and enhancing overnight camping experiences and recreation opportunities as well as improving visitor safety through circulation and access improvements at the nine locations.

Concerns related to visitor congestion, the importance of maintaining a positive visitor experience, reducing visitor conflicts, enhancing visitor safety, and reducing damage to resources in these heavily used areas have driven the need for the VUSMP. By directing and concentrating visitor use in appropriate areas, it is expected that there would be less congestion and conflicts in use, resulting in an enhanced visitor experience. The NPS also would update facilities to meet federal accessibility standards, increase the sustainability of facilities and resources, and improve the efficiency of maintenance and care of the nine sites. Management strategies and supporting improvements are needed to better support visitor access and recreation opportunities and to ensure desired resource conditions and visitor experiences are achieved and maintained. Maintaining the national recreation area's fundamental resources and values requires continuing evaluation of visitor use management issues and needs.

Additional Planning Goals

As the NPS considered ideas and concepts for possible improvements at LARO, public input was gathered in a series of public meetings held in Fall 2018. Public input helped to confirm the following planning goals for the VUSMP and shape potential solutions.

- Define appropriate uses, quantities, and dimensions of facilities for use areas (i.e., campgrounds, boat launches, and day use areas) in the nine priority developed sites.

- Recommend infrastructure redesigns with consideration of visitor use management including visitor use patterns, connections between sites, use types, site resources, and facilities.
- Adjust quantities and dimensions of facilities to support a broader range of vehicles and types of use, as well as to meet federal accessibility standards.
- Establish a consistent, unified character for development.
- Serve as a roadmap to guide decisions on capital improvements, preservation, and development.

ALTERNATIVES CONSIDERED

SELECTED ALTERNATIVE

Based on the analysis presented in the environmental assessment, the NPS has selected Alternative B as described and analyzed in the EA for implementation. Alternative B better meets the need for action by implementing a proactive plan for visitor use management with a range of strategies and supporting improvements at priority sites in the national recreation area. Implementing the plan would result in primarily beneficial impacts to visitor access and circulation, as well as the overall quality of the visitor experience, and more sustainable, longer term solutions that would benefit LARO visitors. With implementation of VUSMP/EA management strategies and supporting improvements, the NPS would be able to more proactively plan for and manage visitor use as visitation levels continue to increase. More staff time can be devoted to enhancing visitor experience rather than managing congestion and resource impacts.

The proposed improvements and management strategies would address current and future issues related to congestion and access, diversify recreation opportunities, enhance visitor safety, and improve visitor experience. Overall, facilities and opportunities related to camping, boating, and day use would be expanded. New efforts toward educating the public and monitoring and documenting resource conditions would help to prevent impacts as well as to identify potential impacts early to proactively avoid or mitigate adverse effects. Impacts from proposed facility improvements would be beneficial in addressing issues associated with congestion and concentrated use. While there would be localized adverse impacts from new facilities built in previously undeveloped areas, these would be limited and located on the margins of developed areas. There also would be areas that are currently developed and disturbed that would be restored to natural conditions under the VUSMP. Impacts from limited areas of development would be managed and mitigated to avoid and minimize significant adverse impacts to resources. All facility improvement and construction activities would include implementation of mitigation measures to avoid, minimize, and mitigate impacts to vegetation, soils, and shoreline conditions.

PRELIMINARY ACTIONS CONSIDERED BUT DISMISSED

The NPS considered various elements or actions that could be part of a future proposed action alternative during the planning process and dismissed these elements for various reasons, including the following.

- Extending the Evans boat launch was dismissed given lowering lake levels that would continue to affect launch levels. Extending the length of the launch would not be a sustainable for the national recreation area's resources over time.
- Various locations for the group campsite at Fort Spokane were dismissed due to concerns related to visitor conflicts and potential resource impacts, in favor of the selected location in the concept plan.
- Installation of RV hookups. This option was considered but dismissed as the NPS does not have the infrastructure at any of the nine sites to handle electricity or sewage for full-service hookups. In addition, these facilities are available in multiple areas adjacent to most LARO campgrounds. Not providing these amenities supports local economy and business by not competing with them.
- Various locations for the new RV campground loop at Keller Ferry were considered and dismissed due to considerations related to visitor use and resource conditions, in favor of the selected location in the concept plan.
- At Spring Canyon, the potential removal of grassy area in the day use area was considered as a potential means to reduce water use and maintenance; however, this was dismissed given the importance of the grassy area to visitors' day use activities.
- Also, at Spring Canyon, the potential to add group sites to the west of site number 2 was considered but dismissed due to the steeper slopes in that location.
- The potential reuse of the existing concession building at Spring Canyon was considered but dismissed in favor of removing the building and repurposing the area for use by vendors. The existing concession building is not well configured for use and would require significant updates. Also, there are limited business opportunities for concessioners given the short season.

WHY THE SELECTED ALTERNATIVE WOULD NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

As defined in CFR 40 Section 1508.27, significance is determined by examining the following criteria:

1. *Impacts that may have both beneficial and adverse aspects in which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in an Environmental Impact Statement.*

No significant impacts to resources were identified that would require analysis in an environmental impact statement. Whether taken individually or as a whole, the impacts of the selected alternative do not reach the level of a significant effect because most adverse impacts associated with implementation would be temporary, lasting only as long as improvements are implemented, and during construction. The overall beneficial impact to visitor use and experience, visitor services, visitor safety, and resource protection would be

long term. Best management practices would be implemented to minimize any potential non-significant adverse impacts. Additional details on potential impacts to resources can be found in the environmental assessment.

2. *The degree to which public health and safety are impacted.*

The selected alternative considers public health and safety in the context of facility designs and management strategies to improve overall visitor experience and visitor safety. Improvements to roads and parking facilities would enhance visitor access and the visitor arrival and departure experience by alleviating confusion and congestion. Visitor safety would be enhanced by implementation of the proposed improvements that call for separation of use areas, better delineated pedestrian paths and access, removal of swim docks, and other measures. Visitor access and safety also would be improved by relocating/modernizing or removing fish cleaning stations and updating camping, day use, boat launch, and beach access facilities to meet federal accessibility standards. Trail improvements would facilitate pedestrian orientation, flow, access, and would reduce visitor-created trails.

3. *Impacts to any unique characteristics of the area (proximity to historic or cultural resources, wild and scenic rivers, ecologically critical areas, wetlands or floodplains, etc.).*

Nothing proposed in Alternative B would be expected to affect the overall unique characteristics or cultural landscapes of the Lake Roosevelt National Recreation Area, or resources having particular cultural importance to affiliated tribes or their ability to access traditionally important resources and places. The NPS remains committed to ongoing and future government-to-government consultation with the tribes as appropriate. As noted in the VUSMP/EA, proposed improvements have only been conceptually designed to a planning level and are not yet fully designed for construction. As project designs are developed and areas of project effects are better defined, these projects would be assessed and reviewed under Section 106 of the National Historic Preservation Act as required by Federal law and NPS policy. Additional archeological surveys, monitoring during construction and other measures would be carried out as necessary to mitigate any adverse impacts.

For sensitive vegetation communities, soils, and shoreline conditions at the site, actions are proposed in the VUSMP/EA that would restore areas to natural conditions through shoreline remediation and revegetation with native plantings. As improvements are designed to more detail, there would be opportunities to align and adjust improvements to avoid sensitive areas and limit new development to the margins of existing disturbed zones (trails, roads, parking areas). As such, impacts to rare vegetation types would be avoided and improvements would not cause any meaningful change to composition or ecology of the presently existing vegetation communities.

In addition, no adverse impacts to floodplains, prime farmlands, wild and scenic rivers, or other ecological critical areas would occur as a result of the proposed action.

Implementation of the management strategies and actions proposed in this VUSMP would require additional National Environmental Policy Act (NEPA) (and as stated above additional National Historic Preservation Act Section 106 compliance), as well as compliance with all other applicable federal, state, and local laws policies, and standards. Such determinations would occur during the future design and engineering phase, prior to construction, of that specific project. The additional compliance would occur as funding is available and projects for each of the sites are phased into implementation.

4. *The degree to which impacts are likely to be highly controversial.*

Throughout the plan development process, no identified environmental impacts have been indicated as controversial. During the public comment period, a number of concerns were expressed about the removal of the swim dock at Spring Canyon, as well as other comments about proposed actions but no comments were received on the environmental impact analysis in the environmental assessment. Further, those concerns were not identified as substantive comments. The attached Response to Comments addresses public comments received on the environmental assessment.

5. *The degree to which the potential impacts are highly uncertain or involve unique and unknown risks.*

Best management practices and mitigation measures implemented during construction on a regular basis by the NPS and LARO staff address natural and cultural resource protection, visitor access and enjoyment, and maintenance and operations within the national recreation area. Anticipated impacts to resources, as analyzed in the environmental assessment, are not highly unique and do not involve unknown risks. Mitigation measures and best management practices would minimize risk to the human and natural environment. Resolving visitor use and experience issues and improvements to visitor services would meet project objectives by implementing strategies to expand and diversify visitor recreation opportunities and to experience the national recreation area's resources while preserving sensitive natural and cultural resources.

6. *Whether the action may establish a precedent for future actions with significant impacts or represent a decision in principle about a future consideration.*

The selected alternative does not establish a precedent for future actions with significant effects, nor does it represent a decision in principle about a future consideration. The proposed actions in the VUSMP would not set a precedent for future actions that could have significant impacts because there have been no significant impacts identified as a potential result of the proposed actions. Project-level NEPA compliance and related analysis would occur with each phase of implementation in the future.

7. *Whether the action is related to other actions that may have individual insignificant impacts but cumulatively significant impacts. Significance cannot be avoided by terming an action temporary or breaking it down into smaller counterparts.*

The environmental assessment concluded that implementing the selected alternative would result in net beneficial impacts for visitor use and experience and natural resources (vegetation, soils, and shoreline conditions). Actions in this plan would not contribute impacts that would individually or cumulatively result in greater adverse impacts than other past, present, or reasonably foreseeable future actions.

8. *The degree to which the action may adversely affect historic properties in or eligible for listing in the National Register of Historic Places, or other significant scientific, archeological, or cultural resources.*

Cultural resources are known to exist in the vicinity of the nine priority sites and various past surveys and studies have documented these resources. Site-specific assessments of cultural resources would occur with future project-level planning, design, and implementation. Given that the VUSMP is a planning proposal that analyzes potential strategies and supporting improvements that could be implemented at the nine sites, a general analysis of the potential for cultural resources impacts was conducted. Overall, implementing improvements and strategies of the VUSMP under Alternative B likely would result in more proactive management of cultural resources and reduced levels of monitoring and mitigation over time, along with reduced concentrations of use in sensitive areas. Proposed facility improvements would help to decrease concentrations of use around known archaeological and historic sites, while proposed management strategies would help the NPS be proactive toward managing potential impacts to cultural resources. As such, Alternative B is the preferred alternative.

Future design, permitting, and construction activities would be required to comply with all applicable requirements and follow procedures in the case of an inadvertent discovery of previously unidentified archaeological resources that may be impacted by ground-disturbing activities. Once project designs are further developed, areas of project effects would be assessed and reviewed under Section 106 of the National Historic Preservation Act as required by Federal law and NPS policy. As appropriate, archeological surveys would be carried out as necessary to mitigate any adverse impacts. Known archeological resources would be avoided to the greatest extent possible. As project designs are developed and areas of project effects are better designed, these projects would be assessed and reviewed under Section 106 of the National Historic Preservation Act, as required by Federal law and NPS policy. Additional archeological surveys, monitoring during construction, and other measures would be carried out as necessary to mitigate any adverse impacts.

9. *The degree to which an action may adversely affect Endangered or Threatened species or its habitat.*

Under current conditions, a mix of native and non-native vegetative species exist at all nine sites studied. The proposed alternative would return some areas to a more natural condition with native vegetation species, a potentially positive outcome of implementing the VUSMP/EA. No plant species of concern have been identified in the areas that would be

affected by the alternatives. There are several state listed plant species of concern that are known to occur in or in close proximity to LARO. Prior to future construction activities, surveys would be conducted to confirm if any special status plant species exist in proposed areas for improvements. If such species are confirmed in any area proposed for improvements in the future, the NPS would follow applicable requirements and protocols related to preservation and protection of these plants. Individual plants found would be marked for avoidance or relocated.

For species of special concern, no designated critical habitat for listed species was determined to be within the areas of effect related to the nine priority sites. There are no known nesting or rearing of young occurrences of any of the current Endangered Species Act (ESA) listed bird species of concern or of any Washington State listed species within areas affected by the proposed action alternative. Humans and vehicles are already regularly present in the areas proposed for change and improvements, which increases the amount of noise that could be experienced by migratory birds an important concern to their habitat. However, at the time of project initiation, mitigation measures such as pre-construction inventory for any bird nesting or rearing activities would be implemented.

10. *Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.*

The proposed actions do not violate any federal, state, or local environmental protection law. The NPS has complied with all Federal, State, and local laws with relevance to the selected alternative.

PUBLIC INVOLVEMENT AND AGENCY CONSULTATION

During preparation of the VUSMP/EA, the NPS consulted with federal and state agencies, tribes, interested and affected parties, and the general public. LARO staff notified Congressional delegations and representatives (federal and Washington state). These activities are described in detail in Chapter 4 of VUSMP/EA and summarized below.

Public Involvement

The NPS facilitated a civic engagement process that began in Fall 2018 with newsletters, displays with potential design concepts, and four public meetings held throughout the region to share possible ideas and concepts with the public and stakeholders and to gather comments on these. The early engagement process served as informal scoping to inform the development of the VUSMP/EA. Civic Engagement meetings were held October 17 and 18, 2018 in the following locations:

- Spokane: October 17, 2018, St. Luke's Rehabilitation Institute LL 1&2, 711 S. Cowley Street, 6:30 pm to 7:30
- Davenport: October 17, 2018, Memorial Hall, 511 Park Street, 6:30 pm to 7:30 pm
- Colville: October 18, 2018, Spokane Community College, Colville Room 132, 985 S Elm Street, 6:30 pm to 7:30 pm
- Grand Coulee: October 18, 2018, Coulee Dam City Hall Ballroom, 300 Lincoln Avenue, 6:30 pm to 7:30 pm

Online public scoping meetings were held during the VUSMP/EA comment period (May 1-31, 2020) on May 7 and May 13, 2020 from 6:30 to 7:30 pm. The public meetings were held as live, online meetings due to the Covid-19 virus outbreak, and attendees participated by asking questions via the chat feature. Participants also could call in by phone to either meeting. Participants were encouraged to submit comments via the NPS PEPC online platform, where the VUSMP/EA, meeting materials, and other project information was published for review.

Washington State Historic Preservation Office

In keeping with the National Historic Preservation Act of 1966 (as amended), consultation would occur with the Washington State Historic Preservation Office (Washington SHPO) as project specific planning progresses and prior to any proposed actions outlined within the plan.

Tribal Consultation

In accordance with Section 106 of the National Historic Preservation Act of 1966 (as amended) and with Executive Order 13175 (Government to Government Consultation with Indian Tribes), LARO staff initiated and engaged in consultation with the tribal communities that have cultural ties to the Lake Roosevelt National Recreation Area. In April of 2018, the NPS began discussing the project and intent to prepare a VUSMP/EA with representatives of the Confederated Tribes of the Colville Reservation, the Spokane Tribe of Indians, the Bureau of Indian Affairs, and the Bureau of Reclamation during our quarterly Five Party Meeting. During the May 2020 Five Party Meeting, NPS discussed the project, announced the preparation of the Draft VUSMP/EA, and the public comment period, as well as the virtual meetings. NPS staff also notified the Tribes of the publishing of the Draft VUSMP/EA on May 7, 2020. LARO staff received no comments on the plan from either Tribe. Also, as stated in the plan, consultation would occur with the Tribes as project specific planning progresses and prior to any proposed actions outlined within the plan.

U.S. Army Corps of Engineers

The NPS would consult with the U.S. Army Corps of Engineers (ACOE) prior to project implementation regarding wetland permitting for the Glacier Point Road Rehabilitation Project, under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act of 1899. The NPS would submit necessary supporting documentation to the ACOE as necessary to obtain any necessary permits prior to any ground-breaking activities as required under the Clean Water Act.

U.S. Fish and Wildlife Service

Section 7 of the Endangered Species Act (1973) requires consultation with the U.S. Fish and Wildlife Service (USFWS) regarding any action authorized, funded, or carried out by a federal agency to ensure that it does not jeopardize any listed species or its critical habitat. During preliminary consultation under Section 7, the NPS was directed to the USFWS website for the most recent list of protected species in the planning area. This list was used as the basis for the special status species analysis in the EA. Because there would be no effect on listed or proposed as threatened or endangered from implementation of the alternatives in the EA, no additional consultation with the

USFWS is necessary. As necessary, proposed actions at some locations may require additional consultation, which would occur as necessary.

FINDING OF NO SIGNIFICANT IMPACT

Based on review of the facts and analysis contained in the VUSMP, the NPS has selected Alternative B, as described above, for implementation. The selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement. The proposed action would not have a significant effect on the human environment in accordance with section 102(2)(c) of the National Environmental Policy Act.

Environmental impacts that could occur are limited in context and intensity, with general beneficial impacts to visitor use and experience and natural resources (vegetation, soils, and shoreline conditions). There are no unmitigated adverse impacts on public health, public safety, or vegetation, or federally threatened or endangered species.

No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative impacts, or elements or precedence were identified. Implementation of the actions would not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an environmental impact statement is not required for this project and thus will not be prepared. The Lake Roosevelt National Recreation Area Visitor Use Site Management Plan would be implemented as soon as practical when funding becomes available.

Recommended: DAN FOSTER Digitally signed by DAN FOSTER
Date: 2020.09.01 18:15:49 -07'00'

Dan A. Foster, Superintendent Date
Lake Roosevelt National Recreation Area

Approved: WOODROW SMECK Digitally signed by WOODROW SMECK
Date: 2020.09.20 16:27:35 -07'00'

Linda Walker, Acting Regional Director Date
National Park Service, DOI Regions 9, 10, and 12

Attachment: Response to Comments

ATTACHMENT A: RESPONSE TO COMMENTS

BACKGROUND

On May 1, 2020, the National Park Service (NPS) at Lake Roosevelt National Recreation Area (LARO/the national recreation area) published a Visitor Use Site Management Plan and Environmental Analysis (VUSMP/EA) that examines nine major visitor use areas: Evans, Marcus Island, Kettle Falls, Gifford, Hunters, Porcupine Bay, Fort Spokane, Keller Ferry, and Spring Canyon. The NPS sought public and agency comments on the VUSMP/EA, which evaluates potential management strategies and supporting improvements for these nine heavily used sites to address a wider range of visitor interests and needs related to camping, boating, day use, and other activities.

Because recreation uses have changed and visitors are using a variety of camping vehicles, many of them larger than in past decades, there is a need to improve and update campgrounds. The NPS is considering diversifying and enhancing overnight camping experiences and recreation opportunities as well as improving visitor safety through circulation and access improvements at these locations. By directing and concentrating visitor use in appropriate areas, it is expected that there would be less congestion and conflicts in use, resulting in an enhanced visitor experience. The NPS also would update facilities to meet federal accessibility standards, increase the sustainability of facilities and resources, and improve the efficiency of maintenance and care of the nine sites.

The VUSMP/EA is a planning document that examines potential strategies and improvements that may be implemented over time, as funding is available. With implementation of improvements at each site, additional project-level NEPA compliance documentation and associated public involvement would occur.

OVERVIEW OF PUBLIC REVIEW PROCESS AND COMMENTS RECEIVED

The NPS facilitated a civic engagement process that began in Fall 2018 with newsletters, displays, and four public meetings held throughout the region to share possible ideas and concepts with the public and stakeholders and to gather comments on these. The early engagement process served as informal scoping to inform the development of the VUSMP/EA. Another newsletter and set of displays were developed with the publishing of the VUSMP/EA, and two online open house meetings were held during the public comment period for the VUSMP/EA (on May 7, 2020 and May 13, 2020) to provide information on the document and instructions to participants about how to formally submit comments. Information also was posted on the NPS Planning, Environment, and Public Comment (PEPC) System. The VUSMP/EA was published on May 1, 2020 and the comment period was open for 30 days, until May 31, 2020. The public meetings were held online due to the Covid-19 virus outbreak, and attendees participated by asking questions via the chat feature of the online meeting platform. Participants were encouraged to submit comments via the NPS Planning, Environment, and Public Comment (PEPC) online platform, where the VUSMP/EA, meeting materials, and other project information was published for review.

During the public review period, 84 correspondences were received through the NPS PEPC website or by mail and e-mail sent directly to the LARO superintendent's office. This report summarizes public comments received during the public comment period and provides NPS responses to those public comments.

DEFINITION OF TERMS

Correspondence: A correspondence is the entire document received from a commenter. It can be in the form of a letter, written comment form, note card, or open house transcript.

Comment: A comment is a portion of the text within a correspondence that addresses a single subject or issue. It could include a reasonable question of the accuracy of the information presented in the plan and environmental document; a reasonable question of the analyses through the adequacy, methods, or assumptions used; provide information that was not presented, but is relevant to the process; or present a reasonable alternative, alternatives, or changes to an alternative in the plan.

Concern Statement: A summary of a group of comments that are centered on a common subject. Concern statements combine similar comments and are intended to accurately portray the views of the commenters. They may or may not be factually true in terms of how they represent the plan, associated actions, or current conditions.

COMMENT ANALYSIS

Specific comments on the plan are summarized below in concern statements. The NPS response to the concern statements are listed following each concern statement.

SUPPORT OR OPPOSITION FOR ALTERNATIVES AND SPECIFIC ACTIONS

Some commenters expressed support or opposition for the preferred alternative presented in the plan. A few comments did express support for the no action alternative. Other comments expressed support for specific actions proposed in the preferred alternative including diversifying camping facilities, improving boat launch and parking areas, repurposing the concession area at Spring Canyon so that food vendors can offer refreshments to visitors in a manageable way, adding a hiking trail from Fort Spokane to Porcupine Bay, and other proposed actions. One comment concurred with the proposed improvements at Porcupine Bay, "The Porcupine Bay Boat Launch Overflow Parking Area needs to be re-designed with delineated parking spaces so that boaters (drivers) can clearly understand where they need to park. Barriers (and clear signage) should be used to keep drivers from parking in inappropriate areas in overflow parking, as well as throughout the access road."

NPS RESPONSE:

The NPS appreciates this informative feedback. Ultimately, it is the substance and rationale provided in the comments that concern the NPS. Comments that support or oppose a proposal or that agree or disagree with NPS policy are not considered substantive and do not

require a formal response. It should be noted that the no-action alternative provides a benchmark to compare what would happen if current management were to continue. While no-action is a viable alternative, the preferred alternative would ultimately fulfill the purpose and need for the plan (see Chapter 1, Purpose and Need).

ONGOING CIVIC ENGAGEMENT

Some commenters expressed appreciation for the opportunity to comment on the draft plan. One commenter encouraged the NPS to continue communication with the public as actions are implemented.

NPS RESPONSE:

The NPS appreciates this informative feedback. LARO staff will continue to communicate and work with the public and its partners at the appropriate times to ensure transparency and inclusion in management decisions. The planning process included a multidisciplinary team from LARO, NPS Pacific West Region (PWR), the NPS Denver Service Center, and Otak, Inc., a contractor specializing in recreation planning. LARO was the lead on all decisions throughout the duration of the planning process. The LARO superintendent will recommend this EA for approval by the regional director per NPS National Environmental Policy Act (NEPA) guidelines. After completion of the plan, LARO will seek necessary funding to implement actions recommended in the plan. Future actions would be subject to NEPA compliance and related public involvement procedures.

SPRING CANYON SWIM DOCK

A portion of the comments received in the correspondences expressed concerns about and opposition to the proposed removal of the swim dock at Spring Canyon, although there are nine within the national recreation area. Many suggested that the swim dock should be replaced or repaired instead of removed.

NPS RESPONSE:

Thank you for your comments and concerns. Swimming is an existing recreational activity critical to maintaining the national recreation area's fundamental resources and values for high-quality recreation experiences. Spring Canyon, the primary location noted in the comments, is one of multiple locations where swim docks are proposed for removal. The decision to keep or remove a swim dock must be made for the national recreation area as a whole, and not for the popularity of an individual location. Visitor safety hazards associated with swimming in the lake and related swim dock activities, present unnecessary risks to the visiting public. The risks associated with swim docks are such that the NPS is unable to mitigate according to NPS Policies which state, "the Service will reduce or remove known hazards and apply other appropriate measures, including closures, guarding, signing, or other forms of education." (2006 NPS Management Policies, 8.2.5.1 Visitor Safety)

Specifically, the NPS is concerned with providing public facilities without proper oversight, that infer a safe use. Swim docks or platforms create dangerous hazards for swimmers for a variety of reasons:

- In general, structures in the water are not safe to recreate near. These can include docks, piers, jetties, or other structures. Not only can waves push a visitor into these structures, but under the right circumstances, even in Lake Roosevelt, dangerous currents can develop that can be fatal.
- The NPS recognizes that the park resources it protects are not only visitor attractions, but that they may also be potentially hazardous. In addition, the recreational activities of some visitors may be of especially high-risk, high-adventure types, which pose a significant personal risk to participants and which the Service cannot totally control. Park visitors must assume a substantial degree of risk and responsibility for their own safety when visiting areas that are managed and maintained as natural, cultural, or recreational environments. (2006 NPS Management Policies, 8.2.5.1 Visitor Safety)
- Structures in the water are slippery, and increase the possibility of slips, trips, and falls, thus increasing the potential for injury. What would be a serious but survivable slip-and-fall injury on land can quickly turn deadly on the water. Uneven surfaces, lack of handrails, slick patches, and items needing repair can all cause unexpected falls and injury.
- One of the greatest difficulties in dock safety is ensuring a consistent depth from the platform to the lake bottom. Changes in the lake level are not under the NPS control, and therefore a consistent water depth cannot be maintained or even indicated on these structures.
- Although the docks were not constructed for jumping or diving, and warnings are posted for such activities, swimmers consistently do so, as is evidenced by the many comments received as to how much visitors and especially children love that activity. Swimmers jump and dive off the docks into the water, which is hazardous because the depths of the reservoir are not constant or consistent enough to ensure safe water entry without traumatic injury.
- The construction of the swim docks is similar to boat docks, in that there are numerous locations underneath them that could entrap swimmers who either attempt to swim underneath or were simply pushed under by wave action.
- There are no industry standards for swim docks. The swim docks at LARO were constructed at different times and with different materials making it difficult to ensure or even obtain a uniform or consistent safety expectation.
- With the docks of various construction types, hazards can potentially include metal edges, splinters, and pinch-points (where dock and pylons slam together due to wave action), that can all create injuries including punctures, cuts, crushed limbs, or even broken bones.

Some comments suggested the NPS reinstate a lifeguard program. While this would give the NPS oversight and may increase public safety to place lifeguards at the many beach access areas, it would be challenging for the NPS to ensure a coverage adequate to ensure swimmer safety or safe dock use. Water-based recreation is a popular activity at LARO, however the

costs of hiring, training, and maintaining consistent staffing is not feasible, which is why it was previously eliminated.

Some comments have also suggested that if the docks are removed, visitors would simply swim near boat docks. Swimming within 100 feet of launch ramps and/or docks is prohibited, as outlined in the Superintendent's Compendium.

An additional comment suggested the swim dock at Spring Canyon could be replaced with a low-profile floating platform that would self-adjust with the surface of the lake in such a way so as to maintain a constant depth to the lakebed. This presupposes that the lakebed is flat or level, which it is not, but it slopes downward away from the shoreline. Because the lakebed is not flat, to maintain a constant depth, even the existing docks would have to be moved to deeper water, or further away from the shoreline, as the lake level goes down. This is the same situation that currently exists, with the exception that the current docks are not moved to deeper water but remain in a single location. Dredging the area under the dock to make it flat would introduce a constant maintenance requirement, as water current would continually deposit sand in the area, thus placing the NPS in a less desirable situation than currently exists. Moving the dock further out into the lake to deeper water is not a viable option due to the additional hazards that would be created related to placing swimmers in proximity to boat traffic.

GROUP CAMPSITES AT SPRING CANYON

One comment expressed interest in retaining the two group campsites at Spring Canyon.

NPS RESPONSE:

The VUSMP proposes retaining one of the group campsites and converting one of the group campsites to a host site, which is needed at Spring Canyon with the proposed expansion of the camping area. The VUSMP also proposes to add a group campsite to the currently vacant area south of the day use area. As such, two group campsites would continue to be provided at Spring Canyon.

ACCESSIBILITY IMPROVEMENTS

A few comments mentioned the importance of upgrading facilities to better accommodate visitors with disabilities. One comment stated, "Being in a wheelchair, I have no doable way of actually getting to the water myself. Has anything been thought about as far as a strip of concrete, or perhaps a portable rubber mat that can be rolled out?"

NPS RESPONSE:

LARO's Accessibility Self-Evaluation and Transition Plan (SETP) calls for a wide variety of actions and improvements at sites to expand accessibility and meet federal accessibility standards. These include improving parking areas and restrooms, as well as providing a broader spectrum of experiences for people with disabilities. Removable roll-out mats for a

firm and stable surface for beachfront areas are proposed by the NPS. As stated in the SETP, LARO will work to implement these improvements as a part of facility alterations or as a component of a planned construction project, as outlined in this VUSMP. The SETP is available for review on LARO's website: <https://www.nps.gov/laro/getinvolved/planning.htm>

NEEDS FOR ADDITIONAL MAINTENANCE AND ENFORCEMENT

Multiple commenters mentioned the need for additional maintenance and enforcement by the NPS in the national recreation area.

NPS RESPONSE:

These comments are acknowledged. Improved management and operations in the future would be an anticipated beneficial outcome of implementing the Visitor Use Site Management Plan for LARO, which introduces a proactive planning and specific strategies and actions at the nine sites. The NPS would be able to better shift labor and resources to address maintenance and enforcement needs throughout LARO with implementation of the VUSMP.

OUT OF SCOPE COMMENTS

There were several comments regarding topics that are outside of the VUSMP scope, either geographically or beyond the purpose and need outlined in the plan. Examples of such topics included reference to fire management planning and sites/locations outside the geographic scope of the VUSMP/EA.

NPS RESPONSE:

These topics and issues raised are outside of the scope of the VUSMP; therefore, they are not addressed. Please refer to Chapter 1, Purpose and Need for the VUSMP. This chapter also defines the planning area (see Figure 1.1 on page 1-2).